

**OCCUPATIONAL SAFETY  
AND HEALTH STANDARDS BOARD**

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**FINAL STATEMENT OF REASONS****CALIFORNIA CODE OF REGULATIONS**

Title 8: Section 5155  
of the General Industry Safety Orders

**Airborne Contaminants - Benzyl Chloride****MODIFICATIONS AND RESPONSE TO COMMENTS RESULTING FROM  
THE 45-DAY PUBLIC COMMENT PERIOD**

There are no modifications to the information contained in the Initial Statement of Reasons.

**SUMMARY OF AND RESPONSES TO WRITTEN AND ORAL COMMENTS:****I. Written Comment**

Ms. Jora Trang, Managing Attorney, Worksafe, letter dated September 12, 2017, via email.

**Comment:**

Ms. Trang commented that Worksafe, was in support of the amendments to Section 5155, regarding Benzyl Chloride.

The Board thanks Ms. Trang and her organization for the comment and participation in the Board's rulemaking process.

**II. Oral Comment**

Oral comment received at the September 14, 2017, Public Hearing in Walnut Creek, California.

Ms. Jora Trang, representing Worksafe.

**Comment:**

Ms. Trang, referred to her organization's written comment letter in support of the proposal.

**Response:**

See response to Ms. Trang written comment above.

**ADDITIONAL DOCUMENTS RELIED UPON**

None.

**ADDITIONAL DOCUMENTS INCORPORATED BY REFERENCE**

None.

**DETERMINATION OF MANDATE**

This standard does not impose a mandate on local agencies or school district.

**ALTERNATIVES CONSIDERED**

The Board invited interested persons to present statements or arguments with respect to alternatives to the proposed standard. No alternative considered by the Board would be (1) more effective in carrying out the purpose for which the action is proposed; or (2) would be as effective as and less burdensome to affected private persons than the adopted action, or (3) would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law. Board staff were unable to come up with any alternatives or no alternatives were proposed by the public that would have the same desired regulatory effect.